

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

CHEVRON CORPORATION,	:	x
	:	
Plaintiff,	:	
	:	
v.	:	11 Civ. 0691 (LAK)
	:	
STEVEN DONZIGER, et al.,	:	
	:	
Defendants.	:	
	:	x

**DECLARATION OF ANNE CHAMPION IN OPPOSITION TO PATRICIO SALAZAR'S
MOTION TO QUASH**

I, ANNE CHAMPION, hereby declare under penalty of perjury pursuant to 28 U.S.C. § 1746, that the following is true and correct:

1. I am an attorney licensed to practice law in the State of New York and before this Court. I am a partner at the law firm of Gibson, Dunn & Crutcher LLP and counsel of record for Chevron Corporation (“Chevron”) in this matter. I make this declaration, based on personal knowledge, in Opposition to Patricio Salazar’s Motion to Quash. If called as a witness, I could and would testify competently as to the content of this declaration.

2. Attached hereto as **Exhibit 1** is a CD containing selected excerpt from the unreleased footage from the movie *Crude*. from a true and correct copy of the, filmmaker Joseph Berlinger began producing to Chevron unreleased footage (“outtakes”) gathered during the filming of the movie *Crude*.

3. Attached hereto as **Exhibit 2** is a true and correct copy of the certified transcription and translation of the video file contained in Exhibit 1.

4. Attached hereto as **Exhibit 3** is a true and correct copy of the certified translation of an email dated May 28, 2007 from Pedro Cordova to Alejandro Ponce Villacis, copying Steven Donziger, 'Havoc CIA, LTDA', Pablo Fajardo, Julio Prieto, Mateo Borrero, and Augustin Salazar with the subject line "Havoc Fw: RV: Recusal of Twentieth Judge", produced by Donziger and Bearing Bates Number DONZ00043310.

5. Attached hereto as **Exhibit 4** is a true and correct copy of the direct testimony of Sara McMillen, filed in this action on October 17, 2013, Docket Number 1569-1 (PX 3300).

6. Attached hereto as **Exhibit 5** is a true and correct copy of the certified translation of an email chain dated September 3, 2007 among Steven Donziger, Pablo Fajardo, and others with the subject line "Pissed off with the HAVOC situation", which was filed in this action on February 6, 2011, Docket number 54-28 (PX 909), produced by Donziger and bearing Bates Number DONZ00062973.

7. Attached hereto as **Exhibit 6** is a true and correct copy of the certified translation of an email dated August 31, 2007 from Julio Prieto to Steven Donziger, Pablo Fajardo, Juan Pablo Saenz, and Luis Yanza with the subject line "will somebody please deal with this now", produced by Donziger and bearing Bates Number DONZ00024971.

8. Attached hereto as **Exhibit 7** is a true and correct copy of the certified translation of an email dated July 12, 2006 from Luis Francisco to Steven Donziger with the subject line "screwed", produced by Donziger and bearing Bates Number DONZ00023125.

9. Attached hereto as **Exhibit 8** is a true and correct copy of a press release by CSR Wire, *Ecuadorian Villagers take steps to Protect Environmental Judgment After Violation of Embargo Order*, Dated July 29, 201, available at https://www.csrwire.com/press_releases/39155-

Ecuadorian-Villagers-Take-Steps-to-Protect-Environmental-Judgment-After-Violation-of-Embargo-Order.

10. Attached hereto as **Exhibit 9** [REDACTED]

[REDACTED]
[REDACTED]
[REDACTED]

11. Attached hereto as **Exhibit 10** [REDACTED]

[REDACTED]
[REDACTED]
[REDACTED]

12. Attached hereto as **Exhibit 11** [REDACTED]

[REDACTED]
[REDACTED]
[REDACTED]

13. Attached hereto as **Exhibit 12** [REDACTED]

[REDACTED]
[REDACTED]
[REDACTED]

14. Attached hereto as **Exhibit 13** are excerpts from a true and correct copy of an excerpt from the September 16, 2019 transcript of a New York state bar attorney disciplinary hearing for Steven Donziger, styled *In the Matter of Steven Donziger*, RP#2018.7008, and

currently pending before the Departmental Disciplinary Committee of the Appellate Division, First Department.

15. Attached hereto as **Exhibit 14** is a true and correct copy press release by CSR Wire, *Chevron Shareholders Slam CEO Mike Wirth Over \$12B Ecuador Pollution Disaster At Annual Meeting*, Dated May 30, 2018, available at https://www.csrwire.com/press_releases/41079-Chevron-Shareholders-Slam-CEO-Mike-Wirth-Over-12B-Ecuador-Pollution-Disaster-At-Annual-Meeting.

16. Attached hereto as **Exhibit 15** [REDACTED]

[REDACTED]

[REDACTED]

17. Attached hereto as **Exhibit 16** is a true and correct copy of the Affidavit #2 of Patricio Salazar Córdova attaching a draft Factum of the Appellants, dated December 27, 2017, and filed in the Court of Appeals for Ontario, Court File No. C63309, C63310.

18. Attached hereto as **Exhibit 17** is a true and correct copy of the 2019 Annual Report for Midland Atlantic LLC, filed with the Florida Division of Corporations.

19. Attached hereto as **Exhibit 18** is a true and correct copy of an Email chain dated October 2, 2019 from Andrea Neuman to James Bailey and Shane Baumgardner, with the subject line “Request for an Extension – Subpoena of Patricio Salazar Cordo”.

20. Attached hereto as **Exhibit 19** is a true and correct copy of a subpoena dated April 13, 2018 and served on Katie Sullivan and Streamline Family Office, Inc. in this action.

Executed on this 18th day of October, 2019 at New York, New York.

/s/ Anne Champion

Anne Champion